

# EXHIBIT 2

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March 12, 2019

## **FOIA REQUEST**

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request access to and copies of:

- Records that reference or mention the words “Operation Secure Line” from September 1, 2018, through present day. “Operation Secure Line” is the initiative formed to monitor the arrivals of migrant caravans along the southern United States/Mexico border. Directives should include but not be limited to, those issued for agents within San Diego Sector Customs and Border Protection, Immigration and Customs Enforcement, Homeland Security Investigations, Office of Field Operations and the U.S. Border Patrol Sector Intelligence Unit.
- All documents uploaded and contained within a SharePoint application titled “ILU-OASISS-OMEGA San Diego Sector, San Diego Sector Foreign Operations Branch, Migrant Caravan FY-2019, Suspected Organizers, Coordinators, Instigators and Media.” These documents include the following documents titled, “Migrant Caravan Support Network 2018” created December 25, 2018, a folder labeled “ICC Tasking Documents,” a folder titled “Xavier Parks MOZEJEWSKI info,” and 25 “.docx” files created on December 18, 2018 and saved within. For general background, [see this article](#) and [images referenced](#).
- Emails, memos or directives discussing the creation and use of a SharePoint application titled “ILU-OASISS-OMEGA San Diego Sector, San Diego Sector Foreign Operations Branch, Migrant Caravan FY-2019, Suspected Organizers, Coordinators, Instigators and Media” from September 1, 2018, and December 31, 2018. This is a list of targets that were identified for secondary screening purposes, as well as targets where alerts were placed on the individuals’ passports.
- Emails shared between the “San Diego Caravan Working Group” related to the “ILU-OASISS-OMEGA” operation monitoring the San Diego caravan.

I would like to receive the information in Electronically.

I agree to pay reasonable fees for the processing of this request up to \$75. Please notify me before incurring any expenses in excess of that amount.

For fee categorization purposes, I am a representative of the news media. Through this request, I am gathering information for my journalistic work with NBC San Diego (KNSD-TV), a broadcast television station that delivers news to San Diego County, California viewers along with delivering news internationally through our website [www.nbcسان迭哥.com](http://www.nbcسان迭哥.com). Accordingly, I am only required to pay for the direct cost of duplication after the first 100 pages. 5 U.S.C. § 552(a)(4)(A)(ii)(II); id. § 552(a)(4)(A)(iv)(II).

Request for Expedited Processing

Please provide expedited processing of this request which concerns a matter of urgency. As a Producer and Reporter, I am primarily engaged in disseminating information. The public has an urgent need for information about "Operation Secure Line," and the activities included within because the public has already expressed great interest in this subject, along with lawmakers who are asking the Department of Homeland Security for answers surrounding this program. I certify that my statements concerning the need for expedited processing are true and correct to the best of my knowledge and belief.

Conclusion

If my request is denied in whole or part, please justify all withholdings by reference to specific exemptions and statutes, as applicable. For each withholding please also explain why your agency "reasonably foresees that disclosure would harm an interest protected by an exemption" or why "disclosure is prohibited by law[.]" 5 U.S.C. § 552(a)(8)(A)(i).

I would appreciate your communicating with me by email or telephone, rather than by mail.

I look forward to your determination regarding my request for expedited processing within 10 calendar days, as the statute requires.

Thank you in advance for your assistance.

Sincerely,

Tom Jones